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**Cc:** Elliot Belilos[ebelilos@ofwlaw.com]  
**From:** Nancy A. Nord  
**Sent:** Fri 11/11/2016 9:13:01 PM  
**Subject:** RE: Recycled Rubber Status Report

Ksenija, The standard to which I referred is ASTM F3188-16, Specifications for Extractable Hazardous Metals in Synthetic Turf Infill Materials, <http://www.astm.org/Standards/F3188.htm>. The standard could be used by the tire crumb producer, the installer could test to the standard, or the installer could require that any infill materials be tested and certified to the standard. (Please note that the standard applies to all synthetic infill materials, not just tire crumb.) The standard is prospective so it would apply to new installations. However, most installers do require testing and certification so that information is available to a field owner if there is a concern about heavy metals in the infill material.

The companies in the Safe Field Alliance, which includes the largest U.S. installers, have committed to compliance with the new standard as have the largest U.S. recycling companies making materials used in infill and playing surfaces. The board of the Synthetic Turf Council, which represents the entire industry, will be meeting shortly to consider amending its Guidelines to call for testing to the new ASTM standard. A very large segment of the industry is committed to assuring that compliance with this standard is the industry practice and communicating that fact to field owners and users.

Please contact me if you have additional questions about this new standard.

Nancy

**Nancy A. Nord, Esq.**



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**From:** Janjic, Ksenija [mailto:Janjic.Ksenija@epa.gov]  
**Sent:** Thursday, November 10, 2016 12:14 PM  
**To:** Nancy A. Nord; Carusiello, Chris; Villamizar, Nicole  
**Cc:** Elliot Belilos  
**Subject:** RE: Recycled Rubber Status Report

Hi Nancy,

Is the standard you mention a standard that a tire crumb producer would use or a standard that a synthetic turf field installer would use? If this is a new testing standard, will it be used in incoming installations or will it also be used on existing fields? Being that the adoption of ASTM standards is voluntary, what is its expected reach?

In the draft status report, we have been including brief information on standards that exist for tire manufacture, tire crumb production and to compare synthetic turf field systems and their components. Since standards are of interest so it would probably be timely to receive relevant and citable information up until early next week.

Ksenija Janjic

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**From:** Nancy A. Nord [<mailto:nnord@ofwlaw.com>]

**Sent:** Thursday, November 10, 2016 11:55 AM

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**Cc:** Elliot Belilos <[ebelilos@ofwlaw.com](mailto:ebelilos@ofwlaw.com)>

**Subject:** Recycled Rubber Status Report

I realize that you all are working hard to document the status of your information gathering efforts from this summer and fall. I wanted to make sure that you are aware of the new ASTM testing standard for all synthetic turf infill products (not only recycled rubber infill). The standard calls for testing the presence of heavy metals using the ASTM 963 toy standard heavy metals levels. The industry is now working hard to implement that new ASTM standard and a release to that effect will be coming shortly. It seems that this effort is relevant to the report you are compiling and should be included.

If you wish further information or have questions, please let me know.

Nancy A. Nord, Esq.



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